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*Counsel to the Joint Liquidators of Three
Arrows Capital, Ltd. (in liquidation)*

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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In re: : Chapter 11
: :
BLOCKFI INC., *et al.*,¹ : Case No. 22-19361 (MBK)
: :
Debtors. : (Jointly Administered)
: :
----- X

¹ The debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965); and BlockFi Lending II LLC (0154) (the "**BlockFi Debtors**"). The location of the BlockFi Debtors' service address is 201 Montgomery Street, Suite 263, Jersey City, NJ 07302.

**APPLICATION FOR ORDER SHORTENING TIME FOR NOTICE OF
(I) MOTION FOR COORDINATION AMONG COURTS AND
(II) MOTION FOR AUTHORIZATION TO FILE MOTION
FOR COORDINATION AMONG COURTS UNDER SEAL**

TO: THE HONORABLE CHIEF JUDGE MICHAEL B. KAPLAN UNITED STATES
BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY

Russell Crumpler and Christopher Farmer, in their capacities as the joint liquidators (collectively, the “**Joint Liquidators**”) appointed in the British Virgin Islands (“**BVI**”) liquidation of Three Arrows Capital, Ltd. (in liquidation) (the “**3AC Debtor**”) and foreign representatives of the 3AC Debtor, as recognized pursuant to chapter 15 of the Bankruptcy Code, by and through their undersigned counsel request that the time period to notice a hearing on (i) the *Motion of the Joint Liquidators of Three Arrows Capital, Ltd. for Coordination Among Courts* (the “**Coordination Motion**”) and (ii) the *Motion for Authorization to File Motion for Coordination Among Courts Under Seal* (the “**Seal Motion**” and together with the Coordination Motion, the “**Motions**”) as required by FED. R. BANKR. P. 2002 be shortened pursuant to FED. R. BANKR. P. 9006(c)(1), for the reason(s) set forth below:

1. Contemporaneously herewith, the 3AC Debtor filed the Coordination Motion and the Seal Motion. The Coordination Motion seeks to schedule a joint judicial conference to discuss procedures to adjudicate the common issues of fact and law raised by the 3AC Claims (as defined in the Coordination Motion) in a centralized forum. The Seal Motion seeks to file the Coordination Motion publicly with statements therein regarding certain claims being advanced in the BVI proceeding redacted, while filing such motion unredacted under seal.

2. The Debtors respectfully request that the Court enter the proposed order (the “**Order**”) attached hereto as **Exhibit A**, scheduling a hearing on the Motions for **October 10, 2023**

at 11:00 ET or at the Court's earliest convenience. A scheduling conference on the Debtors' motion to estimate the 3AC Debtor's claims [Dkt. No. 1346] and objection to the 3AC Debtor's claims [Dkt. No. 1375] is currently scheduled for the October 10, 2023 omnibus hearing. Likewise, the 3AC Debtor's motion for relief from the stay [Dkt. No. 1492] is scheduled to be heard on at the October 10, 2023 omnibus hearing. Each of those matters implicate issues regarding the process and schedule for adjudicating the 3AC claims. The Coordination Motion, which requests that this Court coordinate with the other courts where the 3AC Debtor is asserting similar claims against other Chapter 11 debtors that implicate common issues, also implicates the process and schedule for adjudicating the 3AC claims. Accordingly, the 3AC Debtor respectfully submits that Coordination Motion should be heard together on October 10, 2023 with the other matters relating to the 3AC claims litigation.

3. A shortened notice period will not prejudice any parties and is not prohibited under FED. R. BANKR. P. 9006(c)(1).

WHEREFORE, the Debtors respectfully request entry of the Order shortening the notice period for the Coordination Motion, and for such other and further relief as the Court may deem just and appropriate.

Dated: September 28, 2023
Holmdel, New Jersey

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Respectfully submitted,

/s/ John W. Weiss

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